

REMARKS

This Application has been reviewed in light of the Office Action mailed February 10, 2005. Claims 1-20 were originally pending in the Application. However, Claims 19 and 20 were previously withdrawn as being drawn to a non-elected invention. Thus, Claims 1-18 were pending at the time of the Office Action, which rejected all of Claims 1-18. Applicants have amended Claims 1, 9, 14 and 18 to advance prosecution of this Application. Applicants respectfully request reconsideration and favorable action in this case.

Claim Rejections - 35 U.S.C. § 112, Second Paragraph

The Examiner rejects Claims 1, 3, 9, 14 and 18 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. (Office Action, page 2). In particular, the Examiner alleges that there is insufficient antecedent basis for the term "client console(s)" in Claims 1, 3, 9, 14 and 18. Applicants disagree.

Amended Claim 1 recites, in part:

for each of a plurality of client consoles each having associated filtering criteria:

determining whether particular ones of the plurality of fields of the parsed network management message satisfy the filtering criteria associated with that client console; and

communicating the particular fields of the parsed network management message determined to satisfy the filtering criteria to that client console for display by that client console.

(emphasis added only for the sake of the present discussion)

Independent Claims 9, 14 and 18 recite substantially similar limitations.

The limitation recited above properly introduces "a plurality of client consoles," which provides antecedent basis for the subsequent reference to each client console. The limitation properly refers back to "each" of the plurality of client consoles using the singular term "that client console," which properly corresponds to the singular term "each." It is clear from the wording of the limitation that for each client console, the fields satisfying the

filtering criteria associated with that client console are communicated to that client console for display. Thus, Applicants submit that the introduction of a plurality of client consoles and reference back to each of that plurality of client consoles, is perfectly appropriate and provides sufficient antecedent basis for the term “client console(s).” In addition, Applicants submit that such sufficient antecedent basis extends to Claim 3, which depends from Claim 1.

For at least these reasons, Applicants respectfully request the Examiner withdraw the rejection of Claims 1, 3, 9, 14 and 18 under 35 U.S.C. § 112.

Claim Rejections - 35 U.S.C. § 102

The Examiner rejects Claims 1-17 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,764,955, which issued to Doolan. (“*Doolan*”). To anticipate a claim, a single prior art reference must describe, either expressly or inherently, each and every element of the claim. M.P.E.P. § 2131.

Applicants’ Claim 1, as amended, recites:

A method for processing a network management message comprising:
receiving a network management message;
parsing the network management message into a plurality of fields; and
for each of a plurality of client consoles each having associated filtering criteria:
determining whether particular ones of the plurality of fields of the parsed network management message satisfy the filtering criteria associated with that client console;
and
communicating the particular fields of the parsed network management message determined to satisfy the filtering criteria to that client console for display by that client console.

Applicants respectfully submit amended Claim 1 is allowable over *Doolan* at least because *Doolan* fails to describe every element of Claim 1. For example, *Doolan* fails to disclose at least the following combination of limitations:

- parsing the network management message into a plurality of fields; and
- for each of a plurality of client consoles each having associated filtering criteria:

determining whether particular ones of the plurality of fields of the parsed network management message satisfy the filtering criteria associated with that client console; and

communicating the particular fields of the parsed network management message determined to satisfy the filtering criteria to that client console for display by that client console.

(emphasis added only for the sake of the present discussion)

In general, *Doolan* discloses a gateway that allows a network manager to manage legacy telecommunications network elements by using a dictionary to provide mapping between incompatible message formats. (Abstract, Col. 4, lines 8-26). However, *Doolan* fails to disclose determining whether particular fields of a parsed network management message satisfy filtering criteria of a particular client console, and communicating the particular fields that do satisfy the filtering criteria to that client console, as recited in amended Claim 1.

As teaching “parsing the network management message into a plurality of fields,” the Examiner cites to *Doolan*’s discussion of selecting an appropriate dictionary and using the selected dictionary to map a network management command from a first syntax to a second syntax. (Office Action, page 3; *Doolan*, col. 4, lines 16-21).

As teaching “for each of a plurality of client consoles each having filtering criteria, if the fields satisfy the filtering criteria, communicating the fields to the client console for display by the client console” (as recited by Claim 1 prior to the current amendment), the Examiner cites to *Doolan*’s discussion of using an “Intelligent Alarm Filter” to selectively filter received alarm messages to be forwarded further dictionary mapping or display (Office Action, page 3; *Doolan*, col. 4, lines 16-21 and col. 22, lines 17-28).

The cited portion of *Doolan* discloses:

Intelligent Alarm Filter (IAP) 316 is used in conjunction with GUI 322 or its own graphic user interface to categorize incoming alarms and only pass on those alarms belonging to predetermined set of categories. For example, IAF 316 is generally programmed to screen non-service affecting messages from service affecting messages prior to forwarding to mapper 300. Alarms forwarded to mapper 300 are translated to CMIP and transmitted to manager 200. Alternatively, IAF 316 could be used to filter messages using other criteria; for example, only messages from certain TIDS, certain errors, certain events, etc. Using a graphic interface allows a user to view all alarms or only the filtered. (*Doolan*, col. 22, lines 17-28).

Thus, *Doolan* teaches using an alarm filter to screen received alarm messages. However, *Doolan* does not teach any type of filtering of *particular portions (e.g., fields) of* individual messages. In particular, *Doolan* fails to teach parsing a message into fields, determining whether particular fields of the parsed message satisfy particular filtering criteria, and communicating the particular fields that do satisfy the filtering criteria to a client console, as recited in amended Claim 1. In fact, *Doolan* does not teach any filtering or selective communication of particular fields of a parsed message.

Moreover, Applicants submit that the portion of *Doolan* cited as supporting the parsing step is unrelated to the portion of *Doolan* cited as supporting the filtering step. As discussed above, the portion of *Doolan* cited as supporting the parsing step deals with using a dictionary to map a message from one syntax to another, whereas the portion of *Doolan* cited as supporting the filtering step deals with filtering which alarm messages are to be further processed. These two features are unrelated. Thus, even if *Doolan*'s teaching of using a dictionary to map a message from one syntax to another could be equated with "parsing [a] network management message into a plurality of fields" (which Applicants do not concede), *Doolan*'s teaching of filtering alarm messages clearly cannot be equated with "determining whether particular ones of the plurality of fields of the parsed network management message satisfy the filtering criteria . . . and communicating the particular fields . . . determined to satisfy the filtering criteria to that client console," as recited in amended Claim 1. As stated above, *Doolan* simply does not teach any filtering or selective communication of a parsed message.

Thus, Applicants submit that *Doolan* does not teach at least the limitations presented above. For at least these reasons, Applicants respectfully submit that *Doolan* fails to describe, either expressly or inherently, each and every element of amended independent Claim 1. For analogous reasons, Applicants respectfully submit that *Doolan* fails to describe, either expressly or inherently, each and every element of amended independent Claims 9 and 14. Thus, for at least these reasons, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of independent Claims 1, 9, and 14 as well as their respective dependent claims.

Claim Rejections - 35 U.S.C. § 103

The Examiner rejects Claim 18 under 35 U.S.C. § 103(a) as being unpatentable over *Doolan* in view of U.S. Patent No. 6,731,627, which issued to Gupta, et al. (“*Gupta*”). Applicants respectfully traverse.

First, Applicants submit that Claim 18 is allowable because the proposed combination of *Doolan* with *Gupta* fails to teach or suggest all of the limitations of such claims. In order to establish a *prima facie* case of obviousness, the references cited by the Examiner must disclose all claimed limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974).

Applicants submit that the proposed *Doolan-Gupta* combination fails to teach or disclose at least those limitations discussed above regarding amended independent Claims 1, 9, and 14. For example, the proposed *Doolan-Gupta* combination fails to teach or disclose a “server operable to . . . determine whether particular ones of the plurality of fields of the parsed network management message satisfy the filtering criteria associated with that client console and to communicate the particular fields of the parsed network management message determined to satisfy the filtering criteria to that client console for display by that client console.” In fact, neither *Doolan* nor *Gupta* teach any filtering or selective communication of particular fields of a parsed message.

Second, Applicants submit that the Examiner has not shown the required suggestion or motivation to combine *Doolan* with *Gupta* to teach amended Claim 18. According to

§ 2143 of the Manual of Patent Examining Procedure, to establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings.

The Examiner alleges that “it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Doolan* in view of *Gupta* to [teach the limitations of Claim 18]. One would be motivated to do so to allow applications to communicate with each other regardless of their location or who design them.” (Office Action, page 7). The Examiner further alleges that “it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Abraham* [Applicants assume the Examiner means *Doolan*] in view of *Gupta* to [teach the limitations of Claim 18]. One would be motivated to do so to allow a greater overall system reliability and availability” (Office Action, page 8).

Thus, the only portion of *Doolan* or *Gupta* cited by the Examiner as providing the required suggestion or motivation to combine *Doolan* with *Gupta* is a single, general statement in *Gupta*, which reads: “. . . thereby leading to greater overall system reliability and availability.” (*Gupta*, Col. 40, line 29). Applicants respectfully submit that the single statement cited by the Examiner is insufficient to suggest or motivate the proposed combination of *Doolan* with *Gupta*. First, the statement is an allegation that the invention disclosed by *Gupta* leads to greater overall system reliability and availability. Thus, this statement cannot be used as a suggestion or motivation of *some further modification* that may possibly lead to *even greater reliability and availability*. Moreover, such a broad, general statement about the desirability of “overall system reliability and availability” is insufficient to suggest or motivate the specific proposed combination of *Doolan* with *Gupta*.

Thus, Applicants submit that the Examiner has not shown the requisite suggestion or motivation to combine *Doolan* with *Gupta* to teach the limitations of amended Claim 18.

For at least these reasons, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of amended Claim 18.

Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

The Commissioner is hereby authorized to charge any other fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
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